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January 31, 2025

VIA ECF

The Honorable Jennifer L. Rochon
United States Courthouse
500 Pearl Street
New York, NY. 10007-1312

Re: Martinenko, et. al. v. 212 Steakhouse and Nikolay Volper
22-cv-518 (JLR) (RWL)

Dear Judge Rochon:

We currently represent Defendants 212 Steakhouse, Inc. and Nikolay Volper in the above-referenced action. We request leave to file, under seal and *in camera*, the Declaration of Counsel (Jonathan W. Greenbaum) in further support of our Motion for Leave to Withdraw as Counsel for Defendants, and that the Court excuse our firm from service of the Declaration on other parties to this litigation or their counsel.

Documents in support of motions to withdraw as counsel are routinely filed under seal when necessary to preserve confidentiality of the attorney-client relationship between a party and its counsel. *Thekke v. Lasersculp, Inc.* 2012 WL 225924 at *3 (S.D.N.Y. Jan. 23, 2012). It is also appropriate for a Court considering a counsel's motion to withdraw to consider *in camera* submissions in order to prevent a party from being prejudiced by the application of counsel to withdraw. *Ashmore v. CGI Grp., Inc. No. 11 Civ. 9611 (AT)* Dk. No. 56 (S.D.N.Y. Sep't 20, 2013 (ordering that counsel need not serve his adversary with such papers); L.R. Civ. 1.4 committee notes ("This is not meant to preclude the Court from permitting the reasons for withdrawal to be stated *in camera* and under seal in an appropriate case).

Should the Court deem it necessary to request additional information from us we would provide it.

Respectfully submitted,

A handwritten signature in blue ink, consisting of a large, stylized 'J' followed by a series of loops and a final horizontal stroke.

Jonathan W. Greenbaum

JWG:pb

cc: Counsel of Record (ecf)